

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001 )  
   ) 03 MDL No. 1570 (RCC)  
   ) ECF Case

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This document relates to:

C.A. No. 03-CV-9849 (RCC)

THOMAS E. BURNETT, SR., *et al.* v. AL BARAKA INVESTMENT & DEVELOPMENT CORP., *et al.*

**DEFENDANT PEROUZ SEDAGHATY'S  
ANSWER TO THIRD AMENDED COMPLAINT**

Defendant Perouz Sedaghaty (D60) ("Sedaghaty"), through undersigned counsel, and pursuant to Rule 12, Fed. R. Civ. P., hereby submits his Answer to the *Burnett* Plaintiffs' Third Amended Complaint ("Complaint").

**Introduction**

Pages 199-220 of the Complaint set forth general allegations as to the nature of this case to which no response is required. To the extent that a response is required, Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in the Introduction, other than to deny that there is any basis for this action against him or that plaintiffs are entitled to any relief against him.

**Jurisdiction and Venue**

1. Mr. Sedaghaty denies that this court has subject matter jurisdiction over him under 28 U.S.C. §§ 1331 and 1367, 18 U.S.C. § 1350 (Alien Tort Claims Act), and 18 U.S.C. §§ 2334 and 2338 (Anti-Terrorism Act). Mr. Sedaghaty denies that jurisdiction over plaintiffs' claims against him is proper under 28 U.S.C. §§

1330(a), 1332(a)(2), and 1605, because those provisions apply solely to actions against foreign states.

2. Mr. Sedaghaty denies that jurisdiction over plaintiffs' claims against him is proper under 28 U.S.C. §§ 1605(a)(5) and 1605(a)(7), because those provisions apply solely to actions against foreign states.
3. Mr. Sedaghaty denies that venue is proper under "28" [sic, 18] U.S.C. § 2334 (Anti-Terrorism Act). Mr. Sedaghaty denies that venue is proper under 28 U.S.C. §§ 1391(d) and 1391(f)(4), because those provisions apply solely to actions against foreign states.

**Parties — Plaintiffs**

4. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 4.

**Factual Allegations Against Defendants**

5. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 5.
6. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 6.
7. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 7.
8. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 8.

9. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 9.
10. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 10.
11. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 11.
12. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 12.
13. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 13.
14. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 14.
15. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 15.
16. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 16.
17. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 17.
18. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 18.
19. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 5.

20. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 20.
21. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 21.
22. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 22.
23. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 23.
24. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 24.
25. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 25.
26. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 26.
27. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 27.
28. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 28.
29. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 29.
30. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 30.

31. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 31.
32. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 32.
33. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 33.
34. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 34.
35. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 35.
36. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 36.
37. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 37.
38. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 38.
39. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 39.
40. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 40.
41. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 41.

42. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 42.
43. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 43.
44. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 44.
45. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 45.
46. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 46.
47. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 47.
48. Mr. Sedaghaty denies the allegations in paragraph 48 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 48.
49. Mr. Sedaghaty denies the allegations in paragraph 49 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 49.
50. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 50.
51. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 51.

52. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 52.
53. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 53.
54. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 54.
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56. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 56.
57. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 57.
58. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 58.
59. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 59.
60. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 60.
61. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 61.

62. Mr. Sedaghaty denies the allegations in paragraph 62 insofar as they refer to him.  
Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 62.
63. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 63.
64. Mr. Sedaghaty denies the allegations in paragraph 64 insofar as they refer to him.  
Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 64.
65. Mr. Sedaghaty denies the allegations in paragraph 65 insofar as they refer to him.  
Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 65.
66. Mr. Sedaghaty denies the allegations in paragraph 66 insofar as they refer to him.  
Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in or contemplated by reference in paragraph 66.
67. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 67.
68. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 68.
69. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 69.
70. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 70.

71. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 71.
72. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 72.
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80. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 80.
81. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 81.

82. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 82.
83. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 83.
84. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 84.
85. Mr. Sedaghaty denies the allegations in paragraph 85 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 85.
86. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 86.
87. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 87.
88. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 88.
89. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 89.
90. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 90.
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92. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 92.
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101. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 101.
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103. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 103.
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114. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 114.
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125. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 125.
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131. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 131.
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136. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 136.
137. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 137.
138. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 138.
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142. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 142.
143. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 143.
144. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 144.
145. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 145.
146. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 146.

147. Mr. Sedaghaty denies the allegations in paragraph 147 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 147.
148. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 148.
149. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 149.
150. Mr. Sedaghaty denies the allegations in paragraph 150 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 150.
151. Mr. Sedaghaty denies the allegations in paragraph 151 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 151.
152. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 152.
153. Mr. Sedaghaty denies the allegations in paragraph 153 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 153.
154. Mr. Sedaghaty denies the allegations in paragraph 154 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 154.

155. Mr. Sedaghaty denies the allegations in paragraph 155 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 155.
156. Mr. Sedaghaty denies the allegations in paragraph 156 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 156.
157. Mr. Sedaghaty denies the allegations in paragraph 157 insofar as they refer to himself. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 157.
158. Mr. Sedaghaty denies the allegations in paragraph 158 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 158.
159. Mr. Sedaghaty denies the allegations in paragraph 159 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 159.
160. Mr. Sedaghaty denies the allegations in paragraph 160 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 160.
161. Mr. Sedaghaty denies the allegations in paragraph 161 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 161.

162. Mr. Sedaghaty denies the allegations in paragraph 162 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 162.
163. Mr. Sedaghaty denies the allegations in paragraph 163 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 163.
164. Mr. Sedaghaty denies the allegations in paragraph 164 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 164.
165. Mr. Sedaghaty denies the allegations in paragraph 165 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 165.
166. Mr. Sedaghaty denies the allegations in paragraph 166 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 166.
167. Mr. Sedaghaty denies the allegations in paragraph 167 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 167.
168. Mr. Sedaghaty denies the allegations in paragraph 168 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 168.

169. Mr. Sedaghaty denies the allegations in paragraph 169 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 169.
170. Mr. Sedaghaty denies the allegations in paragraph 170 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 170.
171. Mr. Sedaghaty denies the allegations in paragraph 171 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 171.
172. Mr. Sedaghaty denies the allegations in paragraph 172 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 172.
173. Mr. Sedaghaty admits that Aqeel al-Aqeel and Mansour al-Kadi were formerly officers of the Al Haramain Islamic Foundation, Inc. (U.S.A.), but they resigned on March 27, 2003 and February 22, 2003, respectively, at the request of Mr. Sedaghaty. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 173, to the extent an additional response is required.
174. Mr. Sedaghaty denies the allegations in paragraph 174 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 174, to the extent an additional response is required.

175. Mr. Sedaghaty denies the allegations in paragraph 175 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 175.
176. Mr. Sedaghaty denies the allegations in paragraph 176 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 176.
177. Mr. Sedaghaty denies the allegations in paragraph 177 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 177.
178. Mr. Sedaghaty denies the allegations in paragraph 178 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 178.
179. Mr. Sedaghaty denies the allegations in paragraph 179 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 179.
180. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 180.
181. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 181.
182. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 182.

183. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 183.
184. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 184.
185. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 185.
186. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 186.
187. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 187.
188. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 188.
189. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 189.
190. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 190.
191. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 191.
192. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 192.
193. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 193.

194. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 194.
195. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 195.
196. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 196.
197. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 197.
198. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 198.
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202. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 202.
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204. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 204.

205. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 205.
206. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 206.
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212. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 212.
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214. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 214.
215. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 215.

216. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 216.
217. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 217.
218. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 218.
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225. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 225.
226. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 226.

227. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 227.
228. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 228.
229. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 229.
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238. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 238.
239. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 239.
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242. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 242.
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246. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 246.
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248. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 248.

249. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 249.
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257. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 257.
258. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 258.
259. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 259.

260. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 260.
261. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 261.
262. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 262.
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358. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 358.
359. Mr. Sedaghaty denies the allegations in paragraph 359 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 359.
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382. Mr. Sedaghaty denies the allegations in paragraph 382 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 382.
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400. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 400.
401. Mr. Sedaghaty denies the allegations in paragraph 401 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 401.
402. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 402.
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418. Mr. Sedaghaty denies the allegations in paragraph 418 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 418.
419. Mr. Sedaghaty denies the allegations in paragraph 419 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 419.

420. Mr. Sedaghaty denies the allegations in paragraph 420 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 420.
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551. Mr. Sedaghaty denies the allegations in paragraph 551 insofar as they refer to him. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 551.
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566. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 566.
567. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 567.
568. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 568.
569. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 569.
570. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 570.
571. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 571.

572. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 572.
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598. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 598.
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619. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 619.
620. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 620.
621. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 621.
622. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 622.
623. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 623.
624. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 624.
625. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 625.
626. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 626.

627. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 627.
628. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 628.
629. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 629.
630. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 630.
631. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 631.
632. To the extent that allegations in paragraph 632 refer to Mr. Sedaghaty, he denies them. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 632.
633. To the extent that allegations in paragraph 633 refer to Mr. Sedaghaty, he denies them. Mr. Sedaghaty does not possess sufficient information to admit or deny all other allegations contained in paragraph 633.
634. Mr. Sedaghaty does not possess sufficient information to admit or deny the allegations contained in paragraph 634.

## **CLAIMS**

### **Count One — Foreign Sovereign Immunities Act**

635. Count One only applies to plaintiffs' claims against foreign states; Mr. Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations

of this paragraph constitute a conclusion of law to which no response is required.

To the extent a response is required, the allegations are denied.

636. Count One only applies to plaintiffs' claims against foreign states; Mr. Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required.

To the extent a response is required, the allegations are denied.

637. Count One only applies to plaintiffs' claims against foreign states; Mr. Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required.

To the extent a response is required, the allegations are denied.

638. Count One only applies to plaintiffs' claims against foreign states; Mr. Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required.

To the extent a response is required, the allegations are denied.

639. Count One only applies to plaintiffs' claims against foreign states; Mr. Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required.

To the extent a response is required, the allegations are denied.

640. Count One only applies to plaintiffs' claims against foreign states; Mr. Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required.

To the extent a response is required, the allegations are denied.

**Count Three — Anti-Terrorism Act**

645. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
646. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
647. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
648. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
649. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
650. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
651. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

652. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Three). Mr. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Three against him, or that they are entitled to any relief in this action against him.

**Count Four — Alien Tort Claims Act**

653. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

654. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

655. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

656. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

657. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Four). Mr. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Four against him, or that they are entitled to any relief in this action against him.

**Count Five — Wrongful Death**

658. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
659. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
660. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
661. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
662. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
663. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

664. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Five). Mr. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Five against him, or that they are entitled to any relief in this action against him.

**Count Seven — Survival**

668. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

669. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

670. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Seven). Mr. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Seven against him, or that they are entitled to any relief in this action against him.

**Count Eight — Intentional Infliction of Emotional Distress**

671. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
672. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
673. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
674. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
675. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
676. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Eight). Mr. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Eight against him, or that they are entitled to any relief in this action against him.

**Count Nine — Conspiracy**

677. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
678. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
679. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
680. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
681. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
682. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Nine). Mr. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Nine against him, or that they are entitled to any relief in this action against him.

**Count Ten — Aiding and Abetting**

683. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
684. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
685. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
686. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
687. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
688. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Ten). Mr. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Ten against him, or that they are entitled to any relief in this action against him.

**Count Fourteen — Punitive Damages**

715. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

716. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

717. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

REQUESTED RELIEF (Count Fourteen). Mr. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Fourteen against him, or that they are entitled to any relief in this action against him.

**Count Fifteen — Punitive Damages: Agencies and Instrumentalities  
of the Foreign State Defendant**

718. Count Fifteen only applies to plaintiffs' claims against foreign states; Mr. Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

719. Count Fifteen only applies to plaintiffs' claims against foreign states; Mr. Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

720. Count Fifteen only applies to plaintiffs' claims against foreign states; Mr. Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
721. Count Fifteen only applies to plaintiffs' claims against foreign states; Mr. Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
722. Count Fifteen only applies to plaintiffs' claims against foreign states; Mr. Sedaghaty is not a defendant under the Foreign Sovereign Immunities Act. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

**Common Issues Requiring Consolidation**

723. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

**FIRST AFFIRMATIVE DEFENSE**

(Failure to State a Claim)

Plaintiffs' claims fail to state a claim against Mr. Sedaghaty for which relief may be granted.

**SECOND AFFIRMATIVE DEFENSE**

(Causation)

There is no causal connection between any of Mr. Sedaghaty's activities and plaintiffs' injuries.

**THIRD AFFIRMATIVE DEFENSE**

(Causation)

No act or omission of any agent, servant, or employee of Mr. Sedaghaty proximately caused any harm or damage to plaintiffs.

**FOURTH AFFIRMATIVE DEFENSE**

(Causation)

Mr. Sedaghaty's activities were not the proximate cause of any harm or damage to plaintiffs.

**FIFTH AFFIRMATIVE DEFENSE**

(Other Tortfeasors)

Plaintiffs' damages and injuries were caused by other individuals or entities who are, or are not, named as parties to this action.

**SIXTH AFFIRMATIVE DEFENSE**

(Improper Venue)

This Court is not the proper venue for plaintiffs' claims against Mr. Sedaghaty.

**SEVENTH AFFIRMATIVE DEFENSE**

(Subject Matter Jurisdiction)

This Court does not have subject matter jurisdiction over plaintiffs' claims against Mr. Sedaghaty.

**EIGHTH AFFIRMATIVE DEFENSE**

(Personal Jurisdiction)

This Court does not have personal jurisdiction over plaintiffs' claims against Mr. Sedaghaty.

**NINTH AFFIRMATIVE DEFENSE**

(Insufficient Service of Process)

Plaintiffs have failed to serve Mr. Sedaghaty as required by the Federal Rules of Civil Procedure.

**TENTH AFFIRMATIVE DEFENSE**

(Estoppel)

Plaintiffs are estopped from receiving the relief requested against Mr. Sedaghaty.

**ELEVENTH AFFIRMATIVE DEFENSE**

(Statute of Limitations)

Plaintiffs' claims against Mr. Sedaghaty are barred, in whole or in part, by the applicable statute of limitation(s).

**TWELFTH AFFIRMATIVE DEFENSE**

(Punitive Damages)

Plaintiffs' claims for punitive damages against Mr. Sedaghaty are barred because his activities, as alleged by plaintiffs, were not committed with intent, malice, willful and outrageous conduct aggravated by evil motive, or reckless indifference, and none of his activities in any way were intended to, or did harm, the plaintiffs in this action.

**THIRTEENTH AFFIRMATIVE DEFENSE**

(No Double Recovery)

Plaintiffs' claims for compensatory and punitive damages are barred to the extent that some plaintiffs are also seeking recovery against Mr. Sedaghaty, for the same or similar claims, in the civil action styled Ashton, et al. v. Al-Qaeda Islamic Army, et al., No. 02-CV-6977 (RCC), and in other civil actions consolidated under In re Terrorist Attacks on Sept. 11, 2001, No. 03 MDL No. 1570 (RCC), pending in the United States District Court for the Southern District of New York.

**FOURTEENTH AFFIRMATIVE DEFENSE**

In response to plaintiffs' claims, Mr. Sedaghaty intends to invoke any other defenses, including affirmative defenses, as they may become apparent through discovery, and reserve the right, in accordance with the Federal Rules of Civil Procedure and the Local Civil Rules of the United States District Court for the Southern District of New York, to assert such defenses.

Mr. Sedaghaty requests that the Plaintiffs' Third Amended Complaint be dismissed with prejudice as to him, and that the Court award attorney's fees and costs to Mr. Sedaghaty in defending against a case with no factual or legal basis against Mr. Sedaghaty, and award any other relief that the Court deems just under the circumstances.

Respectfully submitted,

/S/ Lynne Bernabei

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Attorneys for Defendant  
Perouz Sedaghaty (D60)

Dated: August 20, 2004

**CERTIFICATE OF SERVICE**

I hereby certify that on August 20, 2004, I caused the foregoing to be served electronically on counsel of record by the Court's Electronic Case Filing (ECF) System, pursuant to ¶ 9(a) of Case Management Order No. 2 (June 16, 2004).

/s/ Alan R. Kabat

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Alan R. Kabat